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PRODUCT DESIGN and
FABRICATION Inc.
6738 6TH STREET S.W.
P.O. BOX 2489
CEDAR RAPIDS, IA 52406
(319) 365-4619

RECEIVED

APR 22 1992
R/CAEL
HWA SECTION

April 20, 1992

Michael Sanderson
Chief RCRA Branch
US Environmental Protection Agency
Region VII
726 Minnesota Ave
Kansas City, Kansas 66101

Dear Sir:

This letter is a follow up to the one that we sent you on March 24th, 1992. I would like to give you an update on some of the specific things that we have done to correct the violations. I have been appointed the Emergency/Safety Coordinator. This is indeed a new position for me, and there are a lot of areas I am still a little unfamiliar with. I have taken a lot of personal steps to educate myself in this area. Some of the things that I have done are as followed. I have checked a number of books out from the public library on Osha & Industrial Safety. I have made contact with our local college and will be receiving information on a 3 day course in May on OSHA Compliance. I have received a letter in the mail from your company on a EPA Workshop, covering reporting under Section 313, being held here in Cedar Rapids on May 19, 1992. I have also contacted the Cedar Rapids Fire Depart-

ment and spoke with them about their Haz Net Program, and also their "Right To Know, Emergency Response". Once we get all our MSDS in house I will contact them again to get these programs started with our facility. As you can tell, I am taking this all very seriously, I am willing to do what ever I can to educate myself on all these issues.

Enclosed are some copies of Inspection Forms and other information that we have ordered, and provided, while taking the corrective actions on our violation.

Enclosure 1. This is a copy of the sticker that we are applying to all the containers of Hazardous Waste. They allow for all of the required information, including Accumulation Start Date.

Enclosure 2. This is a copy of a Emergency Phone Number Card. I have filled these out and placed one in all the Plant Supervisors Offices near the phone. I also gave copies to the other office employee's who have phones. This provides them with a quick

RCRA



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reference to emergency numbers. It also gives the name of the Emergency Coordinator plus a backup person.

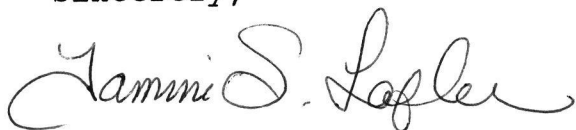
Enclosure 3. This is an Emergency Diagram that I designed. I have made one of these for each of our building. They have been placed by the phones in all the plant supervisors office's. They give the locations of the fire extinguishers, exits, and also where the employee's can find the MSDS Books. They also include the names of the Emergency Coordinator(s). I also put the address of the building so if they do need to call for Fire or Medical help they can more quickly direct them to the right building.

Enclosure 4. This contains copies of 4 items. First is a copy of the inspection log book for our weekly Haz. Waste Inspections. Second is a copy of the weekly inspection form. Third is a copy of a monthly inspection form, this is done to assure that the area's are being maintained properly. Fourth is a copy of the log book for the monthly inspections.

Enclosure 5. This shows a copy of the Training Program that we ordered. We have received this and all current employee's have been trained. I have also enclosed a copy of a Employee Handbook that we gave to all the employee's. I copied a couple of the Training Certificates that we used and have kept on file. Also enclosed is a copy of a Quiz that we gave to all the employee's that covers what the information given on the Video that they watched. This quiz was given so that we knew that they had a basic understanding of the information. They were not graded on these, and after we corrected them, we gave them back to the employee's for their review.

I hope that you will find this information useful in determining that the proper steps were taken to correct the violations that this information applies to. If you have any suggestions or comments in regards to these issues, please feel free to contact me @ 319-365-4619.

Sincerely,

A handwritten signature in cursive script, reading "Tammi S. Lafler".

Tammi Lafler
Emergency/Safety Coordinator

cc: Irv Janey
President (PDF)

①

Photo Copy of our Haz.Waste Sticker that we
are applying to all containers.

HAZARDOUS WASTE		
STATE AND FEDERAL LAW PROHIBIT IMPROPER DISPOSAL		
IF FOUND CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.		
PROPER D.O.T. SHIPPING NAME _____ UN OR NA # _____		
GENERATOR INFORMATION:		
NAME <u>Product Design & Fabrication</u>		
ADDRESS <u>6738 6th St S.W</u>		
CITY <u>Cedar Rapids</u> STATE <u>IA</u> ZIP <u>52404</u>		
EPA ID NO. <u>IAD074880444</u>	MANIFEST DOCUMENT NO. _____	
EPA WASTE NO. _____	STATE _____ WASTE NO. _____	ACCUMULATION START DATE _____
PHYSICAL STATE: <input type="checkbox"/> SOLID <input type="checkbox"/> LIQUID		
HAZARDOUS PROPERTIES: <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> TOXIC		
<input type="checkbox"/> CORROSIVE <input type="checkbox"/> REACTIVITY <input type="checkbox"/> OTHER		
EMERGENCY RESPONSE GUIDE #		
REPORTABLE QUANTITY "RQ" IN POUNDS		
<input type="checkbox"/> 1 <input type="checkbox"/> 10 <input type="checkbox"/> 100		
<input type="checkbox"/> 1000 <input type="checkbox"/> 5000		
"RQ" _____ LBS.		
CONTAINS HAZARDOUS OR TOXIC WASTES		
HANDLE WITH CARE		
© SAFETY SIGN CO., CLEVELAND, OHIO 44136		

Shows
Start Date

EMERGENCY PHONE NUMBERS

Fire Department 911 (or) 398-5202

Police Department 911 (or) 398-5242

Emergency Hospital 911 (or) 369-7105

Emergency Coordinator

Pager #

Facility #

Home #

Ex. 6 PII

1. Tammi Lafler ext. 22 365-4619

2. Tex JANEY ext. 16 365-4619

National Response Center (FIRE, EXPLOSION OR SPILL)

1 800 424-8802

State Pollution Control Agency (EMERGENCY COORDINATOR WILL MAKE CALL) DNR 1-927-3355 (Manchester)

Chemtrec - Information to help with large chemical spills

1 800 424-9300

Poison Control Information 369-7105 (HOSPITAL) or 1-800-955-9119

Gas Supply Company In Till Gas 364-5101

ON-SITE ENVIRONMENTAL SERVICES, INC.

a. Yellow laminated Copy of this Card has been posted in all the Plant Supervisors offices & also given to employees with phones at their desks, throughout the office areas...

[illegible]

- FIRE EXTINGUISHERS
- EXITS
- MATERIAL SAFETY DATA INFO.

EMERGENCY/SAFETY: TAMMI LAFLE
COORDINATOR WORK#365-4619 e

Ex. 6 PII

(BACKUP IRV JANEY 365-4619 ext 16,

BUILDING: PDF UPPER OFFICES, MACH.SHOP
FABRICATION, WELD, MAINT. SHOP
LOCATION: 6738 6TH ST S.W. CEDAR RAPIDS

[illegible]

Copy of Weekly Haz. Waste Log

Bob

DATE / /

INSPECTOR _____

WEEKLY INSPECTION FORM
HAZARDOUS WASTES (SATELLITE STORAGE AREAS)

PAINT DEPARTMENT

North Paint Booth, Free of excessive amounts of waste materials.

North Paint Booth, Free of excessive amounts of paint material.

North Paint Booth, Paint
Filters are in acceptable
condition.

North Paint Booth, unless
in use, ALL paint & waste
containers are closed....

South Paint Booth, Free of excessive amounts of waste materials.

South Paint Booth, Free of excessive amounts of paint material.

South Paint Booth, Paint
Filters are in acceptable
condition.

South Paint Booth, unless
in use, ALL paint & waste
containers are closed...

Paint Prep Area, Free of
waste materials. `

Paint Prep Area, Free of paint materials.

Paint Prep Area, Fire Ex-
tinguishers are properly
located.

[illegible]

(OVER)

INSPECTOR _____

MONTHLY WORK AREA INSPECTION

DEPARTMENT: ASSEMBLY WELD/FAB MACHINE SHOP PAINT DEPT
(circle one)
SHIP/RECEIVING R & D SANDBLAST MAINTENANCE

FIRE EXTINGUISHERS ARE
PROPERLY LOCATED..

EMPLOYEES ARE USING
PROPER PROTECTIVE GEAR

WORK AREAS ARE CLEAN &
FREE OF EXCESSIVE HAZ.
MATERIALS.

FIRST AID IS ADEQUATELY STOCKED.

EXITS ARE CLEAR.

FLOORS ARE CLEAN
(NO SLIPPERY SPOTS)

OUTSIDES OF DEPARTMENTS
ARE REASONABLY CLEAN.

YES

NO

COMMENTS

[illegible]

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